

1 Martin J. Kravitz  
2 Nevada Bar No. 83  
3 L. Renee Green, Esq.  
4 Nevada Bar No. 12755  
5 E-Mail: [mkralevitz@kssattorneys.com](mailto:mkralevitz@kssattorneys.com)  
6 CHRISTIAN, KRAVITZ, DICHTER,  
7 JOHNSON & SLUGA, LLC  
8 8985 S. Eastern Avenue, Suite 200  
9 Las Vegas, Nevada 89123  
10 Telephone: 702.362.6666  
11 Facsimile: 702.992.1000  
12 *Attorneys for Plaintiff,*  
13 *UNITED SPECIALTY*  
14 *INSURANCE COMPANY*

15 **UNITED STATES DISTRICT COURT**

16 **DISTRICT OF NEVADA**

17 UNITED SPECIALTY INSURANCE  
18 COMPANY, a Delaware corporation;

19 Case No.: 2:16-cv-02784-APG-GWF

20 Plaintiff,

21 vs.

22 HACHIMAN, LLC dba PALOMINO CLUB,  
23 LLC, a Nevada limited liability company;  
24 LACY'S, LLC dba LACY'S, a Nevada limited  
25 liability company; DEREK FESOLAI, an  
26 individual; ALEXANDER POTASI, an  
27 individual; JOHNARO LAIRD, an individual;  
28 MARINA LAIRD, an individual; DOE  
INDIVIDUALS I through X, inclusive and  
ROE BUSINESS  
ENTITIES I through X, inclusive,

29 Defendants.

30 **STIPULATION TO EXTEND TIME TO FILE A REPLY TO DEFENDANTS'**  
31 **RESPONSE TO UNITED'S RENEWED MOTION FOR SUMMARY JUDGMENT**  
32 **(FIRST REQUEST)**

33 Plaintiff, UNITED SPECIALTY INSURANCE COMPANY ("United"), by and through  
34 its counsel of record, CHRISTIAN, KRAVITZ, DICHTER, JOHNSON & SLUGA, LLC and  
35 Defendants HACHIMAN, LLC dba PALOMINO CLUB and LACY'S, PALOMINO CLUB,  
36 LLC dba PALOMINO CLUB, LACY'S, LLC dba LACY'S, ADAM GENTILE, and CRAIG  
37 PARKS, by and through their counsel of record, James E. Whitmire, Esq. of SANTORO  
38 WHITMIRE, stipulate to continue the due date for United to file a Reply to Defendants'

1 Response to United's Renewed Motion for Summary Judgment as follows:

2 1. Plaintiff united filed a Renewed and Supplemental Motion for Summary Judgment on  
3 April 23, 2019. ECF No. 51.

4 2. After granting an extension, Defendants filed a Response to United's Renewed  
5 Motion for Summary Judgment on May 21, 2019. ECF No. 56.

6 3. The current due date for United to file a Reply to Defendants' Response to United's  
7 Renewed Motion for Summary Judgment is June 4, 2019.

8 4. United requests a one week extension to file a Reply in good faith and not for the  
9 purposes of undue delay as additional time is needed to prepare a Reply to  
10 Defendants' Response.

11 5. The parties agree that United has up to and including June 11, 2019 to file a Reply.

12 IT IS SO AGREED AND STIPULATED.

13  
14 CHRISTIAN, KRAVITZ, DICHTER,  
15 JOHNSON & SLUGA

16 /s/ L. Renee Green, Esq.  
17 MARTIN J. KRAVITZ, ESQ.  
18 Nevada Bar No. 83  
19 L. RENEE GREEN, ESQ.  
20 Nevada Bar No. 12755  
21 8985 S. Eastern Ave., Suite 200  
22 Las Vegas, Nevada 89123  
23 *Attorneys for Plaintiff,*  
24 *UNITED SPECIALTY*  
25 *INSURANCE COMPANY*

SANTORO WHITMIRE

16 /s/ James E. Whitmire, Esq.  
17 James E. Whitmire, Esq.  
18 Nevada Bar No. 6533  
19 10100 W. Charleston Blvd., Suite 250  
20 Las Vegas, Nevada 89135  
21 *Attorneys for Defendants,*  
22 *HACHIMAN, LLC dba PALOMINO CLUB,*  
23 *LLC, LACY'S, LLC dba LACY'S, ADAM*  
24 *GENTILE and CRAIG PARKS*

22 ORDER

23 IT IS SO ORDERED.

24   
25 UNITED STATES DISTRICT COURT JUDGE  
26 Dated: May 31, 2019.